

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 21-mj-30251

v.

D-1, TIFFANY LIPKOVITCH,
D-2, AMBER BELLAMY,

Defendants.

**STIPULATION TO CONTINUE PRELIMINARY EXAMINATION AND
COMPLAINT**

By and through their respective counsel, **THE PARTIES STIPULATE** and agree that there is good cause to continue the preliminary examination and complaint from October 29, 2021 to November 12, 2021.

IT IS FURTHER STIPULATED that the time period from October 29, 2021, through and including November 12, 2021, shall be deemed excludable delay under the provisions of the Speedy Trial Act, Title 18, United States Code, Section 3161, in consideration of Section 3161(h)(7)(A), that the ends of justice served by continuing the preliminary examination and complaint outweigh the best interests of the public and Defendants in a speedy trial.

The parties stipulate and agree that an ends of justice continuance is appropriate for the following reasons:

1. On May 27, 2021, a criminal complaint charged Defendants Tiffany Lipkovitch and Amber Bellamy (together, “Defendants”) with distribution of a controlled substance and conspiring to distribute controlled substances. (ECF No. 1, PageID.1).

2. Federal agents arrested Defendants on June 2, 2021. Defendants requested and received court-appointed counsel. (ECF No. 8, PageID.27; ECF No. 11, PageID.30).

3. The parties previously agreed to adjourn the preliminary examination to allow the government to provide defense counsel with pre-indictment discovery materials, to allow defense counsel and Defendants to review these materials and the criminal charges, and to allow defense counsel and the government to discuss the same with government counsel, e.g., to determine whether there could be any pre-indictment resolution. The government provided to defense counsel proposed plea agreements for Defendants to consider.

4. The parties seek a short extension of time to finalize some of the provisions of the proposed plea agreements and for the parties to have further pre-indictment plea discussions.

5. The parties agree that the ends of justice served by continuing the preliminary examination and complaint outweigh the best interests of the public and Defendant in a speedy trial.

6. The parties also stipulate and agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial detention or pretrial release.

Accordingly, the parties request that the Court find that, under the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), the period of delay, as a result of the continuance, shall be excluded in computing the time within which the information or indictment must be filed.

So stipulated:

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_____ /

**ORDER TO CONTINUE PRELIMINARY EXAMINATION AND
COMPLAINT**

The Court, having been fully advised by the respective parties, states as follows:

IT IS ORDERED that the preliminary examination and complaint is continued from October 29, 2021 to November 12, 2021 at 1:00PM.

IF IS FURTHER ORDERED that the time period from October 29, 2021, through and including November 12, 2021, shall be deemed excludable delay under the provisions of the Speedy Trial Act, Title 18, United States Code, Section 3161, in consideration of Section 3161(h)(7)(A) for the reasons set forth in the parties' stipulation, which is incorporated by reference—including to allow defense counsel to review the government's plea offers—and, that the ends of justice served by

continuing the preliminary examination and complaint outweigh the best interests of the public and Defendant in a speedy trial.

This order shall not affect any previous order of pretrial detention or pretrial release.

Accordingly, the Court shall find that, under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(7)(A), the period of delay, as a result of the continuance, shall be excluded in computing the time within which the information or indictment must be filed.

IT IS SO ORDERED.

s/Elizabeth A. Stafford
ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date Entered: October 29, 2021